

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

THOMAS R. AHERN,

Plaintiff,

vs.

SIG SAUER, INC., AND CITY OF
CAMBRIDGE

Defendants.

Civil Action No.: 21-cv-11007-DJC

ASSENTED-TO MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rule 7.2, counsel for Plaintiff Thomas Ahern hereby submits this motion for leave to submit under seal certain exhibits attached to the following documents: (1) an Omnibus Opposition to Defendant Sig Sauer, Inc.’s Motions to Exclude Evidence and Opinions of Experts Timothy Hicks, James Tertin, and Peter Villani; (2) an Opposition to Sig Sauer, Inc.’s Motion for Summary Judgment; (3) an Opposition to City of Cambridge’s Motion for Summary Judgment; and (4) an Omnibus Opposition to Defendant City of Cambridge’s Motions to Exclude Evidence and Opinions of Plaintiff’s Experts Scott Reitz and Sheldon Wishnick (collectively, the “Oppositions”).

In furtherance hereof, Plaintiff Thomas Ahern states as follows:

1. Counsel for Mr. Ahern intends to file all the Oppositions on April 5, 2024.
2. In support of his Oppositions, Mr. Ahern intends to include as exhibits select deposition transcripts and documents produced by defendants City of Cambridge and Sig Sauer, Inc., which the defendants have marked confidential subject to this Court’s July 11, 2022, Protective Order. Docket Entry (“D.E.”) 54.

3. Pursuant to the Protective Order in this case, a party seeking to file material designated confidential must first seek to impound such information consistent with Local Rule 7.2 of the U.S. District Court for the District of Massachusetts. Pursuant to Mr. Ahern's obligations under the agreement, he so moves. D.E. 54 ¶ 7.

4. Accordingly, good cause exists to redact the above-referenced exhibits.

5. The Plaintiffs have assented to the relief sought herein.

WHEREFORE, Mr. Ahern hereby requests that the Court enter an Order providing it to file redacted exhibits to the Oppositions under seal.

Respectfully submitted,

Date: April 5, 2024

/s/ Peter K. Levitt

Peter K. Levitt (BBO #565761)
Michelle R. Pascucci (BBO #690889)
Pietro A. Conte (BBO #707055)
DONNELLY, CONROY & GELHAAR LLP
260 Franklin Street, Suite 1600
Boston, MA 02110
Tel: 617-720-2880
pkl@dcglaw.com
mrp@dcglaw.com
pac@dcglaw.com

/s/ Jeffrey S. Bagnell

Jeffrey S. Bagnell
Federal Bar No. CT18983
Admitted Pro Hac Vice
Jeffrey S. Bagnell, Esq., LLC
55 Post Road West
Westport, Connecticut 06880
Tel: 203-984-8820
jeff@bagnell-law.com

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1, I certify that I have conferred with counsel for defendants City of Cambridge and Sig Sauer, Inc. and attempted in good faith to resolve or narrow the issue. The defendants have assented to the relief sought herein.

/s/ Pietro A. Conte
Pietro A. Conte

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), on April 5, 2024.

/s/ Pietro A. Conte
Pietro A. Conte